

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Missouri-American)	
Water Company's Request for Authority)	Case No. WR-2007-0216 and
To Implement a General Rate Increase)	SR-2007-0217
For Water Service Provided in Missouri)	
Service Areas)	

In the Matter of Missouri-American)	
Water Company's Filing of Revised Sewer)	Case No. ST-2007-0443
Tariff Sheets to Implement a Capacity)	Tariff Nos. JS-2007-0713
Charge for Missouri-American's Warren)	and JS-2007-0714
County and Jefferson County Sewer)	
Districts)	

MOTION TO COMPEL

COMES NOW Intervenor City of Joplin and for its Motion to Compel states as follows:

1. On September 10, 2007, the Commission directed:

“Staff shall also file revised Accounting Schedules #1 for each District, demonstrating the revenue requirement for each district as it was determined by the Agreement. For Joplin’s District it shall file a Schedule #1 demonstrating the contrast between the revenue requirement as determined by the Agreement and the variance created utilizing the allocation factors advocated by Joplin.”

2. Staff has failed to comply with the Commission’s Order as it did not submit a revised Accounting Schedule #1 for any district.

3. Staff also failed to comply with the Commission’s Order as it did not file a Schedule #1 demonstrating the contrast between the revenue requirement as determined by the Agreement and the variance created utilizing the allocation factors advocated by Intervenor City of Joplin.

4. Staff has refused to comply with a specific order of this Commission.

WHEREFORE, Intervenor City of Joplin moves this Commission to enter its order directing Staff to produce the documents previously requested by this Commission or in the alternative to strike all Staff pleadings previously filed.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By: 
James B. Deutsch, #27093
Marc H. Ellinger, #40828
Jane A. Smith, #28681
308 East High Street, Suite 301
Jefferson City, MO 65101
Telephone: 573/634-2500
Facsimile: 573/634-3358
E-mail: jdeutsch@blitzbardgett.com
E-mail: mellinger@blitzbardgett.com
E-mail: jsmith@blitzbardgett.com
Attorneys for City of Joplin

Certificate of Service

I hereby certify that true and accurate copies of the foregoing Motion to Compel were served by electronic transmission this 19th day of September, 2007, on:

Office of General Counsel
E-mail: GenCounsel@psc.mo.gov

Ms. Jacqueline Levey
E-mail: jlevey@armstrongteasdale.com

Mr. Stuart Conrad
E-mail: stucon@fcplaw.com

Mr. J. Kent Lowry
E-mail: klowry@armstrongteasdale.com

Mr. Dean Cooper
E-mail: dcooper@brydonlaw.com

Mr. Kevin Thompson
E-mail: Kevin.Thompson@psc.mo.gov

Mr. William R. England, III
E-mail: trip@brydonlaw.com

Mr. Mark W. Comley
E-mail: comleym@ncrpc.com

Mr. Lewis R. Mills, Jr.
E-mail: opcservice@ded.mo.gov

Mr. Jeremiah D. Finnegan
E-mail: jfinnegan@fcplaw.com

Mr. David Woodsmall
E-mail: dwoodsmall@fcplaw.com

Ms. Mary Ann Young
E-mail: myoung0654@aol.com

Mr. Leland Curtis
E-mail: lcurtis@lawfirmemail.com

Mr. William D. Steinmeier
E-mail: wds@wdspsc.com

Mr. Carl Lumley
E-mail: clumley@lawfirmemail.com

Ms. Diana M. Vuylsteke
E-mail: dmvuylsteke@bryancave.com

Ms. Lisa Langeneckert
E-mail: llangeneckert@stolarlaw.com


Mr. Larry W. Dority
E-mail: lwdority@sprintmail.com

Ms. Sherrie A. Schroder
E-mail: saschroder@hstly.com

Mr. James M. Fischer
E-mail: jfischer@aol.com

Michael A. Evans
E-mail: mevans@hstly.com

Mr. Byron Francis
E-mail:
bfrancis@armstrongteasdale.com

A handwritten signature in black ink, appearing to read "A. Smith", is written over a horizontal line.